

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETT

BETTE J. RIVARD, as Administratrix of  
the Estate of John A Horton,  
Plaintiff,  
v.  
DARTMOUTH HOUSE OF  
CORRECTION, BRISTOL COUNTY,  
JOHN DOE, RICHARD ROE, Bristol  
County Corrections employees the identity  
and number of whom is presently unknown  
to the Plaintiff,  
Defendants/Third Party Plaintiffs,  
v.  
PRISON HEALTH SERVICES, INC. and  
CORRECTIONAL HEALTH CARE  
SOLUTIONS, INC.  
Third Party Defendants

Civil Action No.: O4CV12058WGY

**PLAINTIFF, BETTE J. RIVARD'S MOTION  
FOR ADDITIONAL TIME TO FILE  
OPPOSITION TO DEFENDANT'S MOTION  
FOR SUMMARY JUDGMENT**

NOW COMES the Plaintiff, Bette J. Rivard, in the above captioned matter, by and through her attorneys, **Proulx Law Associates, P.C.**, and moves this Honorable Court to allow the Plaintiff more time to submit an opposition to the Defendant's Joint Motion for Summary Judgment and as reasons therefore the Plaintiff states:

1. That Plaintiff needs more time to adequately prepare an effective opposition to Defendant's Joint Motion for Summary Judgment. Fourteen days has not been an adequate amount of time to prepare an opposition to an 160 page motion, (including memorandum and exhibits).
2. That the Plaintiff has co-counsel in this matter Andrew Fischer who has been on vacation and Plaintiff has not had adequate time to confer with co-counsel to finish preparing an opposition.

**Proulx Law  
Associates, P.C.**  
*Attorneys at Law*  
170 High Street, Suite 301  
Taunton, MA 02780-3536  
(508) 823-6441

WHEREFORE, the Plaintiff moves this Honorable Court to allow the Plaintiff an additional 15 days to prepare Plaintiff's opposition to Defendant's Joint Motion for Summary Judgment.

Dated this the 19<sup>th</sup> day of December, 2005.

PLAINTIFF,  
By her Attorney,



Robert M. Proulx, Esquire

Proulx Law Associates, P.C.

Attorneys at Law

170 High Street, Suite 301

Taunton, Massachusetts 02780-3536

Phone: 508.823.6441

Facsimile: 508.967.2737

BBO# 640653

### CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served via first class mail postage pre-paid, on December 19<sup>th</sup>, 2005 to:

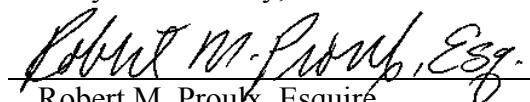
✓

Regina M. Ryan, Esquire  
Merrick Louison & Costello  
67 Batterymarch Street  
Boston, MA 02110

✓

Mary C. Eiro-Bartevyan, Esquire  
Koufman & Frederick, LLC  
265 Essex Street, Ste. 301  
Salem, MA 01970

PLAINTIFF,  
By her Attorney,



Robert M. Proulx, Esquire

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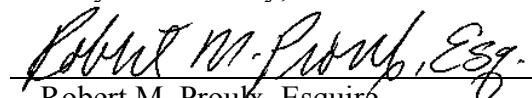
Civil Action No.: O4CV12058WGY

**CERTIFICATE OF COMPLIANCE WITH  
LOCAL RULE 7.1(A)(2)**

NOW COMES the Plaintiff, Bette J. Rivard, in the above captioned matter, pursuant to Rule 7.1(A)(2) of the Local Rules of the United States District Court for the District of Massachusetts, and state that Attorney Robert M. Proulx attempted to confer with the Defendant's counsel, Regina M. Ryan and Mary Eiro Bartevyan to narrow the issues and he was unable to do so.

Dated this the 19<sup>th</sup> day of December, 2005.

PLAINTIFF,  
By her Attorney,



Robert M. Proulx, Esquire

Proulx Law Associates, P.C.

Attorneys at Law

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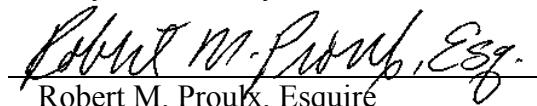
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